

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

In re Rule 45 Subpoena Directed to One.com

Case No.: 2:21-mc-00023 RSL

Related Case No. 2:19-cv-02746-DWL  
U.S. District Court, District of Arizona

**DEFENDANT GODADDY.COM,  
LLC'S NOTICE OF MOTION AND  
MOTION TO COMPEL RESPONSE  
TO RULE 45 SUBPOENA  
DIRECTED TO ONE.COM**

NOTED ON MOTION CALENDAR:  
Friday, March 12, 2021

Defendant GoDaddy.com, LLC (“GoDaddy”), by and through its counsel, files this Motion, pursuant to Rules 37(a)(1) and 45(g) of the Federal Rules of Civil Procedure and LCR 37, to compel One.com to fully and completely comply with the subpoena issued by GoDaddy in the United States District Court for the District of Arizona in connection with a litigation matter entitled *SiteLock, LLC v. GoDaddy.com, LLC* (Case No.: 2:19-cv-02746-DWL). GoDaddy effectuated service of this subpoena on One.com on January 22, 2021, and to date, One.com has neither served any objection to the subpoena, nor provided any response to the subpoena. For the reasons stated in the accompanying Memorandum of Law, along with the

DEFENDANT GODADDY.COM, LLC'S NOTICE OF MOTION  
AND MOTION TO COMPEL RESPONSE TO RULE 45  
SUBPOENA DIRECTED TO ONE.COM - 1

LAW OFFICES OF  
**COZEN O'CONNOR**  
A PROFESSIONAL CORPORATION  
999 THIRD AVENUE  
SUITE 1900  
SEATTLE, WASHINGTON 98104  
(206) 340-1000

1 accompanying Declaration of Paula L. Zecchini and attached exhibits in support thereof,  
2 GoDaddy respectfully requests that this Court grant its Motion and compel One.com to comply  
3 with the subpoena.

4 DATED: February 25, 2021

COZEN O'CONNOR

5  
6 By: s/ Paula L. Zecchini  
7 By: s/ Sydney R. Hitchcock

Paula L. Zecchini, WSBA No. 48266  
E-mail: pzeccchini@cozen.com  
Nathan Dooley, *pro hac vice to follow*  
E-mail: ndooley@cozen.com  
Sydney R. Hitchcock, WSBA No. 55426  
E-mail: sydneyhitchcock@cozen.com

999 Third Avenue, Suite 1900  
Seattle, Washington 98104  
Telephone: 206.340.1000  
Toll Free Phone: 800.423.1950  
Facsimile: 206.621.8783

10  
11 Attorneys for Defendant GoDaddy.com, LLC.  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

DEFENDANT GODADDY.COM, LLC'S NOTICE OF MOTION  
AND MOTION TO COMPEL RESPONSE TO RULE 45  
SUBPOENA DIRECTED TO ONE.COM - 2

LAW OFFICES OF  
**COZEN O'CONNOR**  
A PROFESSIONAL CORPORATION  
999 THIRD AVENUE  
SUITE 1900  
SEATTLE, WASHINGTON 98104  
(206) 340-1000

1  
2                   CERTIFICATE OF SERVICE  
3

4  
5                   I hereby certify that I served the foregoing documents via electronic mail on February  
6 25, 2021, and due to COVID-19 restrictions via overnight mail on February 26, 2021, to the  
7 following:  
8

9                   Thomas A. Gilson  
10                  Beus Gilbert PLLC  
11                  701 N. 44<sup>th</sup> Street  
12                  Phoenix, Arizona 85008  
13                  (480) 429-3000  
14                  tgilson@beusgilbert.com  
15                  Counsel for Plaintiff

16                  Kevin B. Huff  
17                  Thomas G. Schultz  
18                  Leslie V. Pope  
19                  Kellogg, Hansen, et al.  
20                  1615 M Street, N.W. Suite 400  
21                  Washington, DC 20036  
22                  (202) 326-7900  
23                  khuff@kellogghansen.com  
24                  tschultz@kellogghansen.com  
25                  lpope@kellogghansen.com

26                  I further certify that the foregoing documents have been sent out for personal service,  
27 and due to COVID-19 restrictions were also served via overnight mail on February 26, 2021,  
28 on the following:

29                  One.com  
30                  7288 Hanover Green Dr.  
31                  Mechanicsville, VA 23111

32                  DATED this February 25, 2021

33                  COZEN O'CONNOR

34                  By: s/ Paula Zecchini  
35                  Paula Zecchini